

Exhibit 1

Part 1 of 9

- iv. Petitioner is not attempting to circumvent any rules or requirements of the courts in Cyprus and Russia, and this form of discovery has been permitted for proceedings in these forums in the past; and
- v. the discovery requested of the Domestic Banks is also not unduly burdensome or intrusive.

In further support of the Application, Petitioner submits the attached Memorandum of Law and Declaration of Timothy S. Pfeifer with accompanying materials attached hereto as Exhibit A; a proposed Order as Exhibit B; and proposed subpoenas under the Order as Exhibits C through F.

WHEREFORE, Petitioner respectfully prays that this Court enter an order:

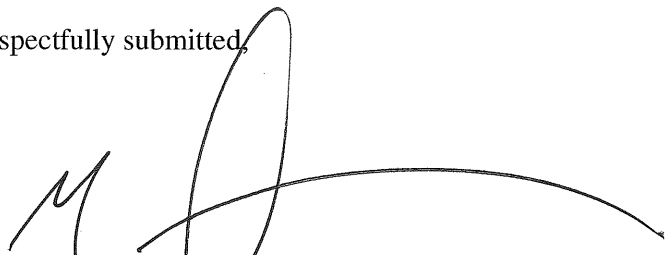
1. Granting Petitioner's Application under 28 U.S.C. § 1782 for discovery from the Domestic Banks;
2. Authorizing Petitioner to take discovery relating to issues identified in this Application and its supporting Memorandum of Law in accordance with the Federal Rules of Civil Procedure and the Rules of this Court, including by: (i) serving on the Domestic Banks the subpoenas for production of documents attached hereto as Exhibits C through F; and (ii) serving additional subpoenas on the Domestic Banks for the production of documents and/or depositions as Petitioner reasonably determines to be appropriate;
3. Directing the Domestic Banks to comply with any subpoenas authorized by this Court's order in accordance with the Federal Rules of Civil Procedure and the Rules of this Court;
4. Appointing the Petitioner's undersigned attorneys, Baker & Hostetler LLP, to issue, sign, and serve any subpoenas authorized by this Court's order;
5. Ordering that testimony in this matter may be taken before any certified court reporter authorized to take testimony and administer oaths in the State of New

York, and that such court reporters are hereby authorized to take testimony in this matter; and

6. Providing that this Court shall retain such jurisdiction as is necessary to enforce the terms of any subpoenas authorized under this Court's order.

Dated: April 13, 2012

Respectfully submitted,



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